

**United States Bankruptcy Court**  
**Northern District of Illinois, Eastern Division**

IN RE: Dino Mugnaini	)	Chapter 13
	)	Case No. 22 B 00416
Debtor(s)	)	Judge Deborah L. Thorne

**Notice of Motion**

Dino Mugnaini  
1711 Liberty Court  
Mount Prospect, IL 60056

Debtor Attorney: Gross & Lazzara  
via Clerk's ECF noticing procedures

On February 16, 2022 at 9:00 am, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: [<https://www.zoomgov.com/>](https://www.zoomgov.com/). Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 160 9362 1728 and the password is not disclosed. The meeting ID and password can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, February 4, 2022.

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 01/13/2022.
2. The debtor(s) have failed to satisfy the liquidation requirement of §1325 (a)(4).
3. The debtor has failed to timely file a Chapter 13 Plan that complies with Bankruptcy Rule 3015.1, which requires the National Chapter 13 Plan form to be filed.

4. The plan that is on file calls for a lump sum payment upon sale of real estate and is otherwise unfeasible .
5. Failure to timely file the correct Plan form is an unreasonable delay that is prejudicial to creditors .

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper .

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE